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**From:** Comnes, Meredith [comnes.meredith@epa.gov]  
**Sent:** 3/21/2022 7:17:18 PM  
**To:** Patel, Reecha (Casey) [Reecha\_Patel@casey.senate.gov]; Levine, Carolyn [Levine.Carolyn@epa.gov]  
**CC:** Niebling, William [Niebling.William@epa.gov]; Pickens, Joycelyn (Casey) [Joycelyn\_Pickens@casey.senate.gov]  
**Subject:** RE: Pesticide labeling questions

Thanks – I'll forward that info to the program office.

Meredith Viola Comnes (she/her)  
Office of Congressional and Intergovernmental Relations  
U.S. EPA  
(202) 564-3193

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**From:** Patel, Reecha (Casey) <Reecha\_Patel@casey.senate.gov>  
**Sent:** Monday, March 21, 2022 12:06 PM  
**To:** Comnes, Meredith <comnes.meredith@epa.gov>; Levine, Carolyn <Levine.Carolyn@epa.gov>  
**Cc:** Niebling, William <Niebling.William@epa.gov>; Pickens, Joycelyn (Casey) <Joycelyn\_Pickens@casey.senate.gov>  
**Subject:** RE: Pesticide labeling questions

Hi Meredith,

Any update you can provide by the end of this week would be great! Thanks,

**Reecha Patel**  
Legislative Correspondent  
U.S. Senator Bob Casey

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**From:** Comnes, Meredith <comnes.meredith@epa.gov>  
**Sent:** Monday, March 21, 2022 11:13 AM  
**To:** Patel, Reecha (Casey) <Reecha\_Patel@casey.senate.gov>; Levine, Carolyn <Levine.Carolyn@epa.gov>  
**Cc:** Niebling, William <Niebling.William@epa.gov>; Pickens, Joycelyn (Casey) <Joycelyn\_Pickens@casey.senate.gov>  
**Subject:** RE: Pesticide labeling questions

Thank you, Reecha

We are still working on getting a response. Do you have any timing requests? We understand the constituent has been waiting for a reply.

Sincerely,

Meredith

Meredith Viola Comnes (she/her)  
Office of Congressional and Intergovernmental Relations  
U.S. EPA  
(202) 564-3193

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**From:** Patel, Reecha (Casey) <Reecha\_Patel@casey.senate.gov>  
**Sent:** Monday, March 21, 2022 9:45 AM

**To:** Levine, Carolyn <[Levine.Carolyn@epa.gov](mailto:Levine.Carolyn@epa.gov)>  
**Cc:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>; Comnes, Meredith <[comnes.meredith@epa.gov](mailto:comnes.meredith@epa.gov)>; Pickens, Joycelyn (Casey) <[Joycelyn\\_Pickens@casey.senate.gov](mailto:Joycelyn_Pickens@casey.senate.gov)>  
**Subject:** RE: Pesticide labeling questions

Hello Carolyn,

Wanted to follow up on the status of this request. Please let me know if you may need anything from us,

**Reecha Patel**  
Legislative Correspondent  
U.S. Senator Bob Casey

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**From:** Levine, Carolyn <[Levine.Carolyn@epa.gov](mailto:Levine.Carolyn@epa.gov)>  
**Sent:** Thursday, March 3, 2022 5:25 PM  
**To:** Patel, Reecha (Casey) <[Reecha\\_Patel@casey.senate.gov](mailto:Reecha_Patel@casey.senate.gov)>  
**Cc:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>; Comnes, Meredith <[comnes.meredith@epa.gov](mailto:comnes.meredith@epa.gov)>; Pickens, Joycelyn (Casey) <[Joycelyn\\_Pickens@casey.senate.gov](mailto:Joycelyn_Pickens@casey.senate.gov)>  
**Subject:** RE: Pesticide labeling questions

Absolutely and totally understand.

Thanks Reecha!

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*Carolyn Levine*  
*Office of Congressional and*  
*Intergovernmental Relations*  
*U.S. EPA*  
*(202) 564-1859 (forwarded)*

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**From:** Patel, Reecha (Casey) <[Reecha\\_Patel@casey.senate.gov](mailto:Reecha_Patel@casey.senate.gov)>  
**Sent:** Thursday, March 3, 2022 4:39 PM  
**To:** Levine, Carolyn <[Levine.Carolyn@epa.gov](mailto:Levine.Carolyn@epa.gov)>  
**Cc:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>; Comnes, Meredith <[comnes.meredith@epa.gov](mailto:comnes.meredith@epa.gov)>; Pickens, Joycelyn (Casey) <[Joycelyn\\_Pickens@casey.senate.gov](mailto:Joycelyn_Pickens@casey.senate.gov)>  
**Subject:** RE: Pesticide labeling questions

Hello,

There is no immediate urgency, but any expediency you can provide would be immensely beneficial. Our constituent has reached out about this to our office for several months.

Please let me know if anything I can provide further,

**Reecha Patel**  
Legislative Correspondent  
U.S. Senator Bob Casey

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**From:** Levine, Carolyn <[Levine.Carolyn@epa.gov](mailto:Levine.Carolyn@epa.gov)>  
**Sent:** Thursday, March 3, 2022 11:00 AM  
**To:** Patel, Reecha (Casey) <[Reecha\\_Patel@casey.senate.gov](mailto:Reecha_Patel@casey.senate.gov)>

**Cc:** Niebling, William <Niebling.William@epa.gov>; Comnes, Meredith <comnes.meredith@epa.gov>; Pickens, Joycelyn (Casey) <Joycelyn\_Pickens@casey.senate.gov>

**Subject:** RE: Pesticide labeling questions

Good morning Reecha,

Our pesticides office has this inquiry but they asked me to check if there was an urgency to this request. We are of course aiming to be responsive, but I'm guessing that it's not particularly urgent- can you let us know anything different?

Thanks,  
Carolyn

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Carolyn Levine  
Office of Congressional and  
Intergovernmental Relations  
U.S. EPA  
(202) 564-1859 (forwarded)

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**From:** Patel, Reecha (Casey) <Reecha\_Patel@casey.senate.gov>

**Sent:** Wednesday, March 2, 2022 11:10 AM

**To:** Levine, Carolyn <Levine.Carolyn@epa.gov>

**Cc:** Niebling, William <Niebling.William@epa.gov>; Comnes, Meredith <comnes.meredith@epa.gov>; Pickens, Joycelyn (Casey) <Joycelyn\_Pickens@casey.senate.gov>

**Subject:** RE: Pesticide labeling questions

Great, appreciate it. Please let me know if you may need anything from my end,

**Reecha Patel**  
Legislative Correspondent  
U.S. Senator Bob Casey

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**From:** Levine, Carolyn <Levine.Carolyn@epa.gov>

**Sent:** Tuesday, March 1, 2022 6:14 PM

**To:** Patel, Reecha (Casey) <Reecha\_Patel@casey.senate.gov>

**Cc:** Niebling, William <Niebling.William@epa.gov>; Comnes, Meredith <comnes.meredith@epa.gov>

**Subject:** RE: Pesticide labeling questions

Hi Reecha,

William shared the inquiry below from your constituent regarding pesticide labeling. We are checking with our program technical folks and we will get back to you with some information to respond to your constituent. Please let us know any additional questions.

Thank you,  
Carolyn

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Carolyn Levine  
Office of Congressional and  
Intergovernmental Relations  
U.S. EPA

**From:** Patel, Reecha (Casey) <Reecha\_Patel@casey.senate.gov>  
**Sent:** Tuesday, March 1, 2022 9:42 AM  
**To:** Niebling, William <Niebling.William@epa.gov>  
**Cc:** Pickens, Joycelyn (Casey) <Joycelyn\_Pickens@casey.senate.gov>  
**Subject:** Pesticide labeling questions

Hello William,

Our office has received the following questions from a constituent regarding pesticide labeling and pesticides that drift. We would appreciate any guidance your team can provide!

1. **Registration and approval of labels:** The EPA is responsible for the registration of pesticides, including approval of "all label language." In some cases, labeling instructions are left vague and open to interpretation by the applicator.

For example, here is the statement from page 6 of label for NuFarm Weedone LV4:

*"2,4-D esters may volatilize during conditions of low humidity and high temperatures. Do not apply during conditions of low humidity and high temperatures."*

It does not specify what is a high temperature, nor what is low humidity. What is a high temperature? What is low humidity? If one poses these questions, an applicator in Maine will likely have a significantly different answer as to what is a high temperature than an applicator in Florida. Also if one asks an applicator in Florida what is a "low humidity" the answer is likely to be significantly different than what would be considered low humidity by an applicator in New Mexico.

Why do some pesticide products get approved with vague labeling? What is the EPA doing to ensure that only accurate, precise labels are approved?

2. **Approval of pesticides that drift:** With the above example, the pesticide is more prone to drift because the specifications on avoiding drift are left vague. Additionally, the EPA has registered pesticides that have a high probability of drift onto neighboring lands and non-target species. Examples include, Metolachlor, Dicamba, and 2,4-D ester (NuFarm Weedone LV4). What steps is the EPA taking to account for pesticide drift in the approval process before allowing the pesticide to be registered?

Please let me know if you may need anything from my end to process.

Thanks,

**Reecha Patel**  
Legislative Correspondent  
U.S. Senator Bob Casey  
393 Russell Senate Office Building  
Washington, DC 20510  
(202) 224-8483

**BOB CASEY**

U.S. Senator for Pennsylvania

